

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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STACY L. RANDALL,

Plaintiff,

v.

Civil Action No. 22-cv-400

REED C. WIDEN, MICHAEL KIESLER,  
WIDEN ENTERPRISES, LLC, and  
WINDY WATERS, INC.,

Defendants.

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**DEFENDANTS' MOTION CHALLENGING PLAINTIFF'S  
CONFIDENTIAL DESIGNATIONS UNDER THE PROTECTIVE ORDER**

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Defendants Reed C. Widen, Michael Kiesler, Widen Enterprises, LLC, and Windy Waters, Inc., by and through their attorneys at O'Neil, Cannon, Hollman, DeJong & Laing S.C. and Holland & Knight LLP, hereby move the Court pursuant to Section E of the Protective Order (ECF Nos. 26-1, 27) to enter an order that the plaintiff's January 16, 2024, confidentiality designations under the Protective Order,<sup>1</sup> designating documents produced by third-party PHH Mortgage Corporation and deposition testimony of the corporate designee of PHH Mortgage Corporation, are not properly designated as confidential.

The grounds for this Motion are set forth in the defendants' brief filed contemporaneously herewith, and the Motion is further supported by the Declaration of Christa Wittenberg filed contemporaneously herewith.

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<sup>1</sup> A copy of the Plaintiff's designation is attached as Exhibit M to the Declaration of Christa Wittenberg, filed on this date.

Dated this 15th day of March 2024.

Respectfully submitted,

s/Dean P. Laing

Dean P. Laing

Christa D. Wittenberg

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